

P.O. Box 1166 Kailua, Hawaii 96734 Fax: (808) 254-5552

Phone: (808) 254-5111 / (808) 254-0601

Monday, April 07, 2003

The Honorable Ann Veneman Secretary, U.S. Department of Agriculture Country of Origin Labeling Program Agricultural Marketing Service Stop 0249 Room 2092-SM 1400 Independence Avenue, SW Washington, DC 20250-0249

Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program

Dear Secretary Veneman:

I am writing in response to your request for comments on the U.S. Department of Agriculture's (USDA's) "Guidelines for the Interim Voluntary Country of Origin Labeling of Beef, Lamb, Pork, Fish, Perishable Agricultural Commodities, and Peanuts" (hereinafter Voluntary COL Guidelines). I am the Chief Executive of Down to Earth Natural Foods. Down to Earth Natural Foods is a Hawaii six store chain of vegetarian natural foods stores in Hawaii.

As a food retailer, the law holds me responsible for informing consumers of the country of origin of all non-processed fresh and frozen fruits and vegetables, and peanuts that are sold in our retail stores. Only my suppliers know the country of origin of these products. I cannot look at a hand of bananas and know whether it is from Costa Rica or Guatemala. USDA must issue regulations that will hold suppliers responsible for giving me complete, accurate and verifiable information.

Moreover, the requirement to keep two years of records at every retail store on the country of origin of every covered commodity is outrageous. Most of these perishable products are sold and consumed within a few days. As a relatively small retailer, I simply do not have the physical or electronic storage capacity to keep two years worth of records on the country of origin of every covered commodity in every store.

Please issue clear and reasonable regulations quickly that will allow me to comply with the law without putting me out of business or limiting my ability to continue to provide consumers with a fresh and abundant supply of food products.

Sincerely.

dini pian Mark Fergusson '

Chief Executive & Chief Financial Officer

And the country of the control of th Ball of the thick declarate the control of the cont scioux devoted require MELOCKEL THE CONTROL

lieriscurpe de financia de como esta comme esta como esta en esta en esta en esta en esta entre en el como esta Analier i is fill observition of Sciencias (1803) matt translatinistate tost and main estitution. and proceeding the commentation of excellent and a commentation of the control of the control of the control of Alur, mercus delek sistu, yiki kurdan kurubah dut. Koleselia bandan burikat da usikat dabah pakekan deleke าง นักบ้างความเพลง เอเบล้ รายนาจังเวา ก็ขาบางที่คือว่า อได้เดิมใช้เรา เรียบ หรือ อยู่! "คกุลเล้า pag, ซ จัง

Engle Postar me, in our plantener grantsy of Organic Poling States, permit Poli